

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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NICOLE STEWART, SHANNON
FITZGERALD, and SUMMER APICELLA,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

-against-

CASE NO.
1:21-cv-01217-MKV

NURTURE, INC.,

Defendant.

----- X
STEPHANIE SOTO, individually and on
behalf of all others similarly situated,

Plaintiff,

-against-

1:21-cv-01271-MKV

NURTURE, INC.,

Defendant.

----- X
NITA JAIN, individually and on behalf
of all others similarly situated,

Plaintiff,

-against-

1:21-cv-01473-MKV

NURTURE, INC. d/b/a Happy Family Brands

Defendant.

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----- X
JODI SMITH, individually and on behalf
of all others similarly situated,

Plaintiff,

-against-

7:21-cv-01534

NURTURE, INC.

Defendant.

----- X
LILLIAN HAMPTON, KELLY MCKEON,
AND JEN MACLEOD, individually and on
behalf of all others similarly situated,

Plaintiffs,

-against-

1:21-cv-01882

NURTURE, INC., d/b/a Happy Family
Organics and Happy Baby Organics,

Defendant.

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**DECLARATION OF LORI G. FELDMAN IN FURTHER SUPPORT OF THE *STEWART*
PLAINTIFFS' MOTION FOR CONSOLIDATION AND TO SET DEADLINES**

LORI G. FELDMAN declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury,
that the following is true and correct:

1. I am a member of George Gesten McDonald, PLLC, counsel for Plaintiffs Nicole Stewart, Shannon Fitzgerald, and Summer Apicella (the "*Stewart* Plaintiffs") in the above-captioned actions.

2. I submit this declaration in further support of the *Stewart* Plaintiffs' Motion for Consolidation and to Set Deadlines. This declaration is made upon personal knowledge, except where otherwise noted.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Consolidation Order entered on March 15, 2021 in *Keeter v. Gerber Products Co.*, 1:21-cv-00269-LO-TCB (E.D. Va.), ECF No. 8.

4. Attached hereto as Exhibit 2 is a true and correct copy of the Plaintiffs' Stipulation [and Proposed Order] to Consolidate Actions under Fed. R. Civ. P. 42(a) and Order entered on March 19, 2021 in *Thomas et al. v. Beech-Nut Nutrition Co.*, 1:21-cv-0133-TJM-CFH (N.D.N.Y.), ECF No. 55.

5. Attached hereto as Exhibit 3 is a true and correct copy of the Order Consolidating Cases entered on March 9, 2021 in *Gulkarov v. Plum PBC*, No. 21-cv-00913-YGR (N.D. Cal.), ECF No. 14.

6. Attached hereto as Exhibit 4 is a true and correct copy of the Related Case Order entered on March 18, 2021 in *Gulkarov v. Plum PBC*, No. 21-cv-00913-YGR (N.D. Cal.), ECF No. 22.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 29, 2021
New York, New York

/s/ Lori G. Feldman
LORI G. FELDMAN

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 29, 2021, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Lori G. Feldman
LORI G. FELDMAN